

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:
ALL ACTIONS INVOLVING ANY
RIDDELL DEFENDANT

Hon. Anita B. Brody

**STIPULATION AND [PROPOSED] ORDER TO EXTEND
PAGE LIMITS AND DEADLINES**

This stipulation and agreement, dated January 9, 2018, is made and entered into by and among the Riddell defendants¹ and lead counsel on behalf of the plaintiffs filing claims against the Riddell defendants (collectively, the "parties").

WHEREAS, on October 24, 2017 this Court issued an order (ECF No. 8472) ("October order") setting forth the schedule and terms for motion practice with respect to the plaintiffs' second amended master administrative complaint against the Riddell defendants (SAMAC-Riddell);

WHEREAS, the parties have agreed to a one-week extension of the deadlines with respect to the briefing on the motions to dismiss the SAMAC-Riddell given that weather caused delays (including office disruptions) in Richmond, Virginia, where Riddell defendants' counsel has offices, the week of January 1;

¹ For convenience only, Riddell defendants refers collectively to the following defendants: Riddell, Inc., All American Sports Corporation, Riddell Sports Group, Inc., BRG Sports, Inc. (f/k/a Easton-Bell Sports, Inc.), BRG Sports, LLC (f/k/a Easton-Bell Sports, LLC), EB Sports Corp., and BRG Sports Holdings Corp. (f/k/a RBG Holdings Corp.).

WHEREAS the parties have also agreed to an extension of the page limits for the parties' opening briefs to be filed in connection with one of the motions as part of the initial motion practice as set forth below;

WHEREAS, this is the parties' first agreement and request on extending deadlines and page limits for briefs with respect to initial motion practice on the SAMAC-Riddell, and the parties agree that the requested deadline extension will not prejudice either party;

It is hereby stipulated and agreed by the parties that:

- (i) The Riddell defendants' brief in support of their motion to dismiss the SAMAC-Riddell on grounds including but not limited to Rules 8, 9, and 12 (referred to in paragraph 3(ii) of the October order), shall not exceed fifty (50) pages; and
- (ii) The plaintiffs' opposition to the Riddell defendants' motion to dismiss the SAMAC-Riddell referenced above shall not exceed fifty (50) pages.
- (iii) The page-limit extensions reflected above shall not apply to the briefs in connection with the Riddell defendants' motion for dismissal on preemption grounds (referenced in paragraph 3(i) of the October order).
- (iv) The deadline for the Riddell defendants' motions to dismiss the SAMAC-Riddell on preemption grounds and on grounds including but not limited to Rules 8, 9, and 12 (referred to in paragraph 3(i) and (ii) of the October order) shall be extended to January 19, 2018.
- (v) The deadline for the plaintiffs' opposition briefs to the Riddell defendants' motions to dismiss the SAMAC-Riddell on preemption grounds and on grounds including but not limited to Rules 8, 9, and 12 (referred to in paragraph 3(i) and (ii) of the October order) shall be extended to March 20, 2018.

- (vi) The deadline for the Riddell defendants' reply briefs in support of the Riddell defendants' motions to dismiss the SAMAC-Riddell on preemption grounds and on grounds including but not limited to Rules 8, 9, and 12 (referred to in paragraph 3(i) and (ii) of the October order) shall be extended to May 4, 2018.

It is so STIPULATED AND AGREED,

By: /s/ Wendy Fleishman

By: /s/ Eden M. Darrell

Date: January 9, 2018

Dated: January 9, 2018

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Co-lead Counsel on behalf of Plaintiffs

Counsel for the Riddell defendants

IT IS SO ORDERED, based on the above stipulation that:

- (i) The Riddell defendants' brief in support of its motion to dismiss the SAMAC-Riddell on grounds including but not limited to Rules 8, 9, and 12 (referred to in paragraph 3(ii) of the October order), shall not exceed fifty (50) pages;
- (ii) The plaintiffs' opposition to the Riddell defendants' motion to dismiss the SAMAC-Riddell referenced above shall not exceed fifty (50) pages;
- (iii) The deadline for the Riddell defendants' motions to dismiss the SAMAC-Riddell on preemption grounds and on grounds including but not limited to Rules 8, 9, and 12 (referred to in paragraph 3(i) and (ii) of the October order) shall be extended to January 19, 2018;
- (iv) The deadline for the plaintiffs' opposition briefs to the Riddell defendants' motions to dismiss the SAMAC-Riddell on preemption grounds and on grounds including but not limited to Rules 8, 9, and 12 (referred to in paragraph 3(i) and (ii) of the October order) shall be extended to March 20, 2018; and
- (v) The deadline for the Riddell defendants' reply briefs in support of the Riddell defendants' motions to dismiss the SAMAC-Riddell on preemption grounds and on grounds including but not limited to Rules 8, 9, and 12 (referred to in paragraph 3(i) and (ii) of the October order) shall be extended to May 4, 2018.

ANITA B. BRODY, J.

Copies VIA ECF on _____ to: Copies MAILED on _____ to: